



EDMUND G. BROWN JR.
GOVERNOR

MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

State Water Resources Control Board
Division of Drinking Water

March 2, 2015

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Certified Mail

Lassen County Service Area No. 2
c/o City of Susanville
720 South Street
Susanville, CA 96130

Attn: Mr. Dan Newton, Public Works Director

**Subject: Public Water System No. 1805001 – Citation 01-02-15(C)002
November 2014 Exceedance of the Bacteriological Maximum Contaminant Level**

Enclosed is a citation issued to the City of Susanville (City), operator of the Lassen County Service Area No. 2 public water system (Service Area) in Johnstonville. The citation is being issued because the Service Area failed to comply with the drinking water standard for total coliform bacteria in November 2014. Please be aware that the Directives section of the citation contains required action that must be taken by the City and Service Area to return to compliance.

Note that Section 116577 of the California Safe Drinking Water Act provides for our Division to be reimbursed by the public water system costs incurred for preparing and issuing a citation to that system. In accordance with Section 116577, the City will be billed for the preparation and issuance of this citation. Our current costs are approximately \$126 per hour. The estimated time to prepare the citation is two hours.

If you have any questions, please contact Sandi Tenney at (530) 224-4876, or me at (530) 224-4800.

Michael J. McNamara, P.E.
Lassen District Engineer
DRINKING WATER FIELD
OPERATIONS BRANCH

Enclosures

cc: Richard Hinrichs, P.E., Chief - Northern California Section, DDW, Redding
Russ Brown, Water Utility Supervisor, City of Susanville
Lassen County Environmental Health Department, Susanville

1805001/Enforcement

FELICIA MARCUS, CHAIR | THOMAS HOWARD, EXECUTIVE DIRECTOR

364 Knollcrest Drive, Suite 101, Redding, CA 96002 | www.waterboards.ca.gov

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Attn: Dan Newton, Public Works Director/City Engineer

The State Water Resources Control Board (hereinafter "Board"), acting by and through its Division of Drinking Water (hereinafter "Division") and the Deputy Director for the Division (hereinafter "Deputy Director"), hereby issues a citation to the Lassen County Service Area No. 2 Water System located in Johnstonville and operated by

1 the City of Susanville (hereinafter, City) (720 South Street, Susanville, CA 96130), for
2 violation of California Code of Regulations (CCR), Title 22, Sections 64426.1 (b) and
3 64430.

4
5 **APPLICABLE AUTHORITIES**

6 **Section 116650 of California Health and Safety Code provides:**

7
8 (a) If the Division determines that a public water system is in violation of
9 this chapter or any regulation, permit, standard, citation, or order issued or adopted
10 thereunder, the Division may issue a citation to the public water system. The citation
11 shall be served upon the public water system personally or by certified mail. Service
12 shall be deemed effective as of the date of personal service or the date of receipt of
13 the certified mail. If a person to whom a citation is directed refuses to accept delivery
14 of the certified mail, the date of service shall be deemed to be the date of mailing.

15 (b) Each citation shall be in writing and shall describe the nature of the
16 violation or violations, including a reference to the statutory provision, standard, order,
17 citation, permit, or regulation alleged to have been violated.

18 (c) A citation may specify a date for elimination or correction of the
19 condition constituting the violation.

20 (d) A citation may include the assessment of a penalty as specified in
21 subdivision (e).

22 (e) The Division may assess a penalty in an amount not to exceed one
23 thousand dollars (\$1,000) per day for each day that a violation occurred, and for
24 each day that a violation continues to occur. A separate penalty may be assessed for
25 each violation.

26

1 **California Code of Regulations, Title 22, Section 64422, subsections (a), and (c)**
2 **provides in relevant part:**

3 (a) By September 1, 1992, each water supplier shall develop and submit to the
4 Department a siting plan for the routine collection of samples for total
5 coliform analysis, subject to the following:

6 (1) The sample sites chosen shall be representative of water throughout the
7 distribution system including all pressure zones, and areas supplied by
8 each water source and distribution reservoir.

9 (2) The water supplier may rotate sampling among the sample sites if the
10 total number of sites needed to complies with (a)(1) above exceeds the
11 number of samples required according to Table 64423-A. The rotation
12 plan shall be described in the sample siting plan.

13 (c) The supplier shall submit an updated plan to the Department at least once
14 every ten years and at any time the plan no longer ensures representative
15 monitoring of the system.

16
17 **California Code of Regulations, Title 22, Section 64426.1, subsection (b)**
18 **provides, in relevant part:**

19 (b) A public water system is in violation of the total coliform MCL [maximum
20 contaminant level] when any of the following occurs:

21 (1) For a public water system which collects at least 40 samples per
22 month, more than 5.0 percent of the samples collected during any
23 month are total coliform-positive; or

24 (2) For a public water system which collects fewer than 40 samples per
25 month, more than one sample collected during any month is total
26 coliform-positive; or

27 (3) Any repeat sample is fecal coliform-positive or E. coli-positive; or

1 (4) Any repeat sample following a fecal coliform-positive or E. coli-
2 positive routine sample is total coliform-positive.
3

4 **California Code of Regulations, Title 22, Section 64430, provides, in relevant**
5 **part:**

6 A public water system that uses ground water shall comply with the following
7 provisions of 40 Code of Federal Regulations as they appear in the Groundwater Rule
8 published in 71 Federal Register 65574 (November 8, 2006) and amended in 71
9 Federal Register 67427 (November 21, 2006) and 74 Federal Register 30953 (June
10 29, 2009).
11

12 Section 141.402. (a) *Triggered source water monitoring-*

13 (1) *General requirements.* A ground water system must conduct triggered
14 source water monitoring if the conditions identified in paragraphs (a)(1)(i)
15 and (a)(1)(ii) of this section exist.

16 (ii) The system is notified that a sample collected under 22 California
17 Code of Regulations section 64422 and 64423 is total coliform-
18 positive and the sample is not invalidated under 22 California
19 Code of Regulations section 64425.

20 (2) *Sampling requirements.* A ground water system must collect, within 24
21 hours of notification of the total coliform-positive sample, at least one ground
22 water source sample from each ground water source in use at the time the total
23 coliform-positive sample water collected under 22 California Code of
24 Regulations sections 64422 and 64423, except as provided in paragraph
25 (a)(2)(ii) of this section.

1 (h) *Monitoring violations.* Failure to meet the requirements of
2 paragraphs (a)-(f) of this section is a monitoring violation and requires the
3 groundwater system to provide public notification under Section 141.204.
4

5 **STATEMENT OF FACTS**

6 The City operates the Lassen County Service Area No. 2 (CSA), also known as the
7 Johnstonville Water System, a non-transient non-community water system, which,
8 serves a population of approximately 40 people through one service connection, a
9 California Department of Transportation (CalTrans) maintenance yard. The water
10 system includes one active well (Well 01), one 120,000-gallon storage reservoir, and
11 two booster pumps. Disinfection has not historically been provided. The City
12 operates under Water Supply Permit No. 01-02-95(P)18001, issued on March 6, 1995
13 to Lassen County Service Area No. 2. The City of Susanville has since acquired the
14 water system on November 13, 2014.
15

16 On November 12, 2014, one routine bacteriological sample was collected from the
17 distribution system. This sample showed the presence of total coliform bacteria. Four
18 repeat bacteriological samples were collected from the distribution system on
19 November 14, 2014. Each of the four repeat samples was positive for total coliform
20 bacteria and negative for *E. coli*. A repeat sample was not collected from the
21 groundwater water supply well on November 14, 2014. On November 18, 2014, four
22 additional repeat bacteriological samples were collected from the distribution system
23 and Well 01. The three samples collected from the distribution system were positive
24 for total coliform bacteria and negative for *E. coli*. The sample from Well 01 was
25 negative for total coliform bacteria. On November 19, 2014, the City began
26 chlorinating at the well under the direction of the Division. On November 24, 2014,
27 three bacteriological samples were collected from the distribution system. Each of

1 these samples was negative for total coliform bacteria. On December 22, 2014, the
2 City collected four samples from the distribution system and one from Well 01. Each
3 of these samples was negative for total coliform bacteria.

4 5 **DETERMINATION**

6 The Division has determined that the City violated Section 64426.1(b)(2) and 64430,
7 Title 22 of the CCR, in that the City exceeded the total coliform MCL during the month
8 of November 2014 and failed to collect a groundwater sample within 24 hours of
9 notification of a total coliform-positive sample.

10 11 **DIRECTIVES**

12 The City is hereby directed to take the following actions:

- 13
- 14 1. Comply with Section 64426.1 and Section 64430, Title 22, of the CCR in all
15 future monitoring periods.
 - 16
 - 17 2. Within 30 days of receipt of this Citation, or by no later than April 10, 2015,
18 notify all persons served by the City of the MCL violation as required by
19 Section 64463.4 and Section 64465, Title 22, of the CCR. Notification shall be
20 completed in accordance with each of the following:
 - 21 a. Mail or direct delivery of the notice contained in Attachment 'A' to each
22 customer receiving a bill including those that provide their drinking water
23 to others (e.g., schools or school systems, apartment building owners,
24 or large private employers), and other service connections to which
25 water is delivered by the Lassen County Service Area No. 2.



b. Provide the notice contained in Attachment 'A' to customers using one or more of the following methods to reach persons not likely to be reached by a mailing or direct delivery:

- i. Publication in a local newspaper,
- ii. Posting in conspicuous public places within the service area,
- iii. Posting on the Internet, or
- iv. Delivery to community organizations.

Changes and/or modifications to Attachment 'A' shall be not be made unless approved by the Division.

3. Complete and return Attachment 'B' "Certification of Completion of Public Notification" form within 10 days of giving public notice or by no later than April 20, 2015. A copy of the notice used to provide public notification shall be attached to the form.

4. The City shall ensure that all bacteriological samples collected for compliance purposes are clearly labeled as described in the City's Bacteriological Sample Siting Plan, in order to remain in compliance with the monitoring requirements of the primary standards for total coliform bacteria.

All documents required by this Citation shall be submitted to the Division to the following address:

Michael J. McNamara, P. E.
Lassen District Engineer
State Water Resources Control Board
Division of Drinking Water
364 Knollcrest Drive, Suite 101
Redding, CA 96002
(530) 224-4800



1 Nothing in this Citation relieves the City of its obligation to meet the requirements of
2 Health and Safety Code, Division 104, Part 12, Chapter 4 (California Safe Drinking
3 Water Act), or any regulation, permit, standard or order issued or adopted thereunder.
4

5 The Division reserves the right to make such modifications to this Citation, as it may
6 deem necessary to protect public health and safety. Such modifications may be
7 issued as amendments to this Citation and shall be effective upon issuance.
8
9

10 **PARTIES BOUND**

11 This Citation shall apply to and be binding upon the City, its officers, directors,
12 shareholders, agents, employees, contractors, successors, and assignees.
13

14 **SEVERABILITY**

15 The Directives of this Citation are severable, and the City shall comply with each and
16 every provision thereof, notwithstanding the effectiveness of any other provision.
17

18 **FURTHER ENFORCEMENT ACTION**

19 The California SDWA authorizes the Board to: issue citation with assessment of
20 administrative penalties to a public water system for violation or continued violation of
21 the requirements of the California SDWA or any permit, regulation, permit or order
22 issued or adopted thereunder including, but not limited to, failure to correct a violation
23 identified in a citation or compliance order. The California SDWA also authorizes the
24 Board to take action to suspend or revoke a permit that has been issued to a public
25 water system if the system has violated applicable law or regulations or has failed to
26 comply with an order of the Board; and to petition the superior court to take various
27 enforcement measures against a public water system that has failed to comply with

1 violates an order of the Board. The Board does not waive any further enforcement
2 action by issuance of this citation.

3

4

5 March 2, 2015

6 Date

7

8

9

Michael J. McNamara

Michael J. McNamara, P.E.

Lassen District Engineer

Division of Drinking Water

State Water Resources Control Board

10

11 Attachments:

12 'A' Public Notification Template

13 'B' Certification of Completion



IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER

Este informe contiene información muy importante sobre su agua potable.
Tradúzcalo o hable con alguien que lo entienda bien.

**Tests Showed Coliform Bacteria in the Lassen County Service Area
No. 2 Domestic Water System**

Our water system recently violated a drinking water standard. Although this is not an emergency, as our customers, you have a right to know what you should do, what happened, and what we did to correct this situation.

We routinely monitor for drinking water contaminants. On November 12, 2014, the Service Area collected one routine sample from the distribution system that contained total coliform bacteria. The four repeat samples collected from the distribution system on November 14, 2014, also contained total coliform bacteria. The three follow-up samples collected from the distribution system on November 18, 2014, again contained total coliform bacteria. The sample collected from the well was absent for total coliform bacteria. The standard is that no more than one sample per month may show the presence of total coliform bacteria.

What should I do?

You do not need to boil your water or take other corrective actions. However, if you have specific health concerns, consult your doctor.

People with severely compromised immune systems, infants, and some elderly may be at increased risk. These people should seek advice about drinking water from their health care providers. General guidelines on ways to lessen the risk of infection by microbes are available from EPA's Safe Drinking Water Hotline at 1(800) 426-4791.

What does this mean?

This is not an emergency. If it were, you would have been notified immediately. Total coliform bacteria are generally not harmful themselves. *Coliforms are bacteria which are naturally present in the environment and are used as an indicator that other, potentially-harmful, bacteria may be present. Coliforms were found in more samples than allowed and this was a warning of potential problems.*

Usually, coliforms are a sign that there could be a problem with the system's water source or distribution system (pipes). Whenever we detect coliform bacteria in any sample, we do follow-up testing to see if other bacteria of greater concern, such as fecal coliform or *E. coli*, are present. **We did not find any of these bacteria in our subsequent testing, and further testing shows that this problem has been resolved.**

What happened? What was done?

The water system was chlorinated and flushed. The three follow-up samples collected from the distribution system on November 24, 2014, were absent for total coliform bacteria. The five routine samples collected during December 2014, including one from the well source were absent for total coliform bacteria. The Service Area complied with the state standard for coliform bacteria during the month of January 2014. The cause of the contamination has not been determined.

For more information, please contact Russ Brown at (530) 257-1045 or 720 South Street, Susanville, CA 96130.

This notice is being provided to you by Lassen County Service Area No. 2 in compliance with the California Domestic Water Quality and Monitoring Regulations as a means of keeping the public informed.

CERTIFICATION OF COMPLETION OF PUBLIC NOTIFICATION

Public Water System Name Lassen County Service Area No. 2

Public Water System No. 1805001

_____The attached notice was posted in the following conspicuous places:

For this method, provide the date (or dates) that the notice was posted _____

I hereby certify that the above information is factual.

Printed Name _____

Signature _____

Date _____